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MEETING NOTES

TO: Distribution **DATE:** April 6, 1994
FROM: Philip Nixon **PROJECT:** Solar Pond IM/IRA
MEMO #: SP307 040694 01

ATTENDANCE:

DISTRIBUTION:

Steve Howard, DOE/SMS
Phil Nixon, ES
Lee Pivonka, G&M
Harlen Amscough, CDH
Arturo Duran, EPA
Cindy Gee, ES
Shaleigh Whitesell, PRC
Richard Henry, ES
Ron Schmiermund, ES
Andy Ledford, EG&G
Harry Heidkamp, ES
Loren McManus, EG&G
Peter Bierbaum, ERM
Marc Hill, ES
Ned Krohn, ES
Steve Hughes, ES
Dave Myers, ES
Rick Millikin, ES
Alan MacGregor, ERM

Dave Ericson, EG&G
L Benson, ES
A Conklin, ES
K Cutter, ES
S Stenseng, ES
A Fricke, ES
T Kuykendall, ES
T Evans, ES
B Cropper, ES
C Montes, ES
R McConn, ES
W Edmonson, ES
B Wallace EG&G (Admin
Record) (2)
S Hughes, ES
K London, EG&G
Jesse Roberson, DOE
Helen Belencan, DOE
Steve Howard, DOE/SMS
John Evans, ES
Scott Surovchak, DOE
John Haasbeek, ERM
Randy Ogg, EG&G
Mark Austin, EG&G

Steve Cooke, EG&G
Joe Schieffelin, CDH
Dave Myers, ES
S Winston, ES
Kim Ruger, EG&G
Michelle McKee, EG&G
Marcia Dibiasi, IGO
Rich Stegen, ES
Bob Siegrist, LATO
Kevin Loos, DOE
Frazer Lockhart, DOE
Toni Moore, EG&G
Will Barnard, ES
Alan McGregor, ERM
Ted Kearns, DOE/KMI
Pat Breen, ES
Peg Witherill, DOE
Steve Keith, EG&G
John Rampe, DOE
John Hicks, ES
John Evans, ES
Steve Paris, EG&G
Bob Glenn, ES
Rick Wilkinson, ES
Central Files

SUBJECT Weekly Status Meeting

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A-OU04-000726

1) Building 788

Ned Krohn presented the selected path forward for the disposition of Building 788. The assumptions that guided the disposition strategy included

- The concrete pad is included in the OU4 IM/IRA and is not specifically part of Building 788
- All waste materials contained in RCRA unit 21 and 48 will be removed prior to doing the closure work
- All materials in RCRA unit 21 and 48 will be at least low-level radioactively contaminated and may be mixed wastes
- The OU4 CAMU will incorporate RCRA units 21 and 48
- The analysis is based on the current baseline design of the engineered cover

Arturo Duran indicated that it should be assumed that all materials are mixed waste

It was discussed that EG&G will remove the contents which remain in the clarifier, but the pumps and pipes will not be flushed and cleaned. Therefore, the piping will require flushing and cleaning prior to closure.

The main factors considered in the selection of a disposition alternative were

- Environmental, Health and safety
- Impact to OU4 remediation schedule
- Waste minimization
- Cost

Ned specified that the alternatives analysis was not intended to be a section of the IM/IRA-EA decision document. It will be a stand alone document for submittal to EG&G/DOE.

The EPA and CDH requested that they be provided a copy of the alternatives analysis so that they could determine that the appropriate alternative has been selected. **Steve Howard agreed to provide this document to CDH/EPA for review and concurrence.**

Phil Nixon indicated that it was preferred to keep the Building 788 alternatives evaluation outside of the main body of the IM/IRA-EA decision document because the focus for the

IM/IRA-EA decision document is to select a closure strategy for the Solar Evaporation Ponds, and the Building is being treated similarly to a utility that stands in the way of SEP closure implementation. There are two ways to include the alternatives assessment within the IM/IRA-EA decision document

- Include a reference and citation to the report
- Provide the alternatives evaluation report as an Appendix to the IM/IRA-EA decision document

The selected alternative is to remove the building and disposition the waste materials beneath the engineered cover. This alternative was selected because it minimized the amount of waste generated in that there would be no decontamination waste streams and no waste that would require storage/disposal. The materials will be dispositioned above the subsurface drainage layer beneath the engineered cover and which will be protective of human health and the environment. The strategy is also the most cost effective alternative.

CDH questioned whether the disposition of the materials beneath the engineered cover within the CAMU was allowable. The materials could be dispositioned within the CAMU if the wastes were designated remediation wastes as opposed to newly generated wastes which typically result from RCRA closures.

Phil Nixon indicated that ES had assumed that the Building 788 material would be "remediation waste" based on previous meetings with E&G, DOE, and CDH.

It was decided that the proposed alternative would be acceptable from a regulatory point of view if the following flow diagram provided affirmative answers (see next page)

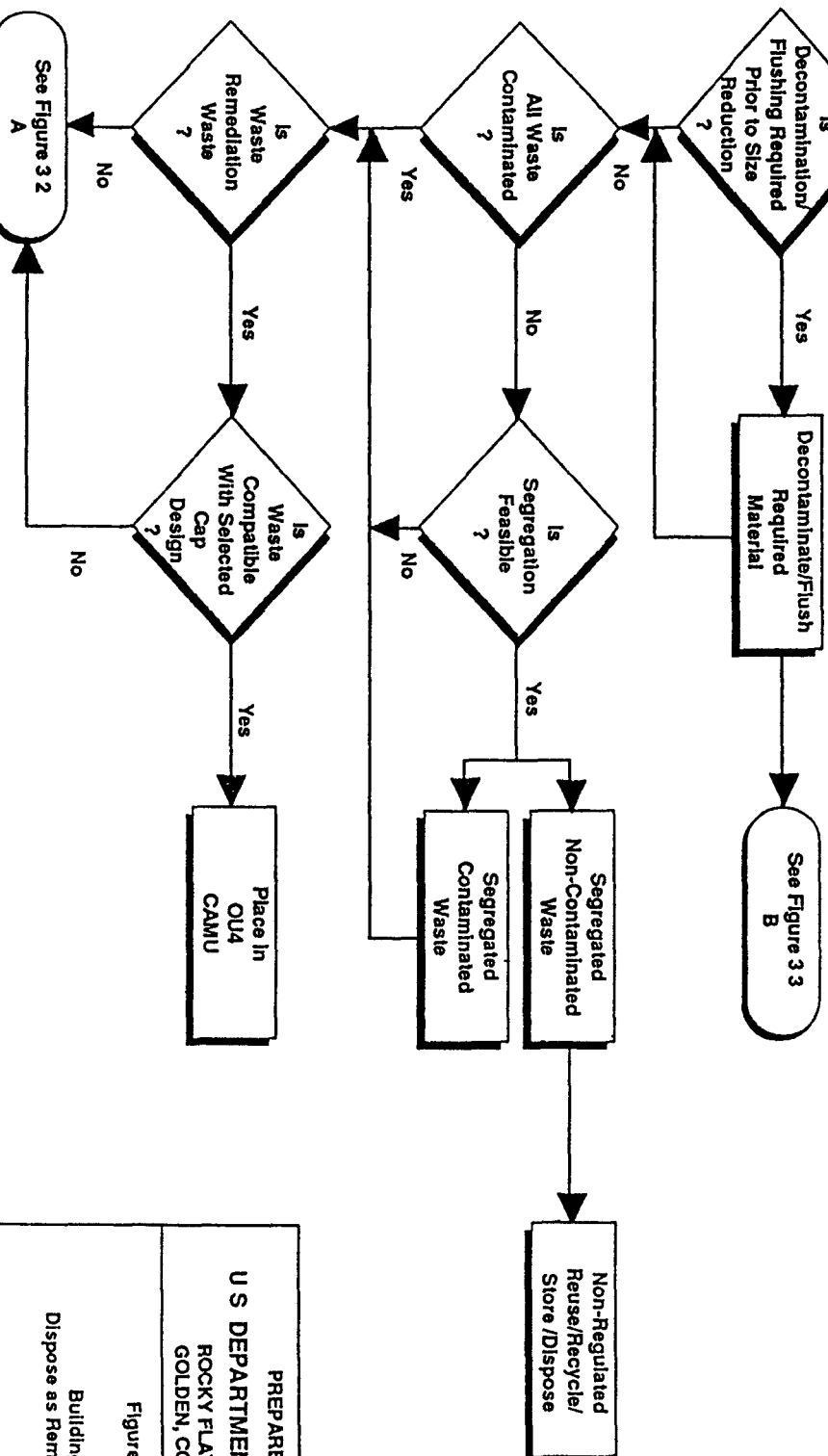
The key to resolving the issue concerning the disposition of Building 788 materials will be the determination of whether the materials are considered remediation waste. The following rationale were discussed with respect to why the wastes may be considered remediation wastes

- The building is within IHSS 101 and is being closed at this time because it is in the way of the OU4 remediation. If it were not for the OU4 remediation, then Building 788 would continue to be used for waste storage.

Building 788
(Units 21 and 48)

Perform Hazardous Waste Characterization
40 CFR 262.11-Subpart C (60CCR 1007-3,262 11)
40 CFR 261-Subpart D (60CCR 1007-3,261)

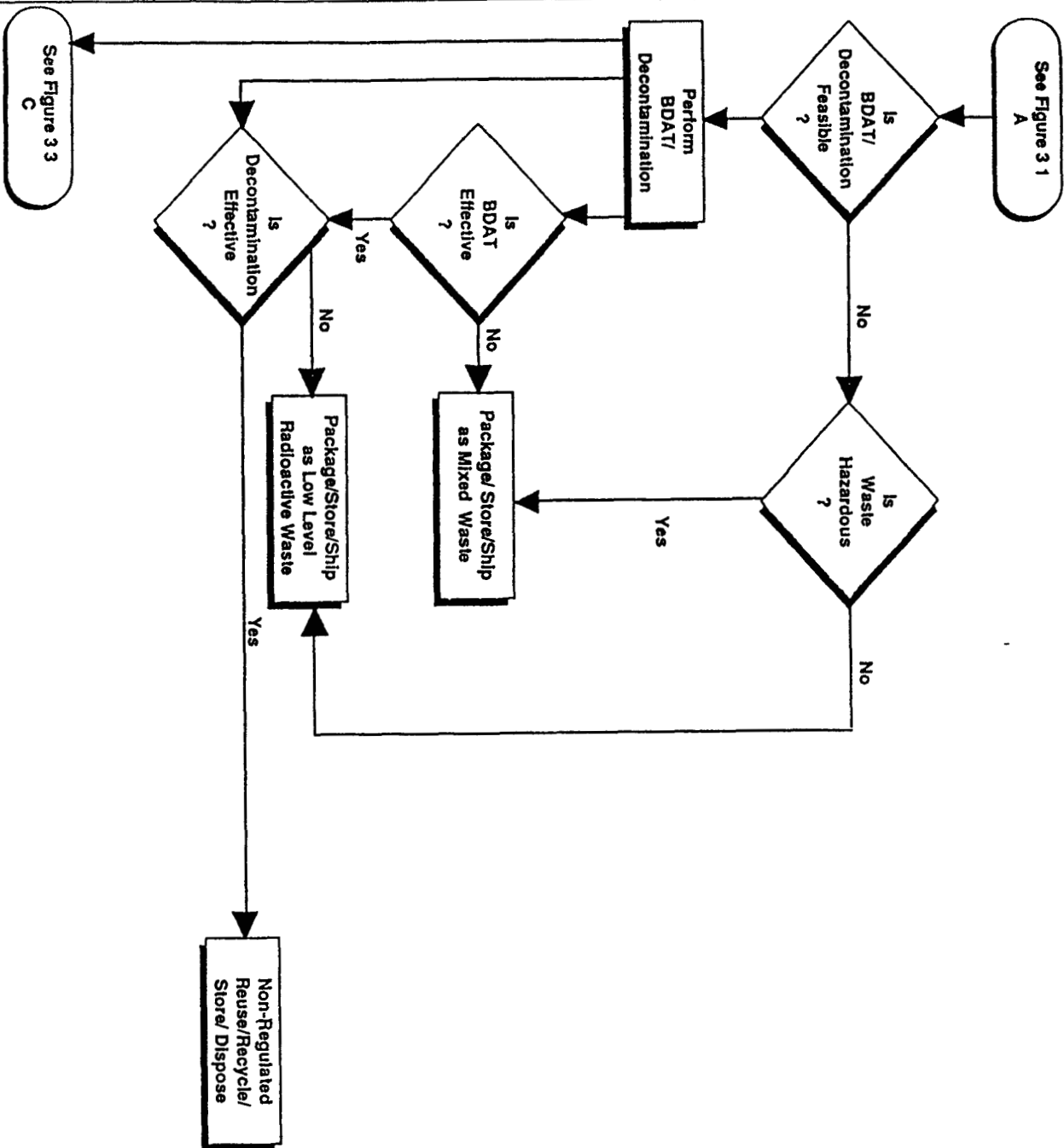
Select PPE
ALARA Analysis



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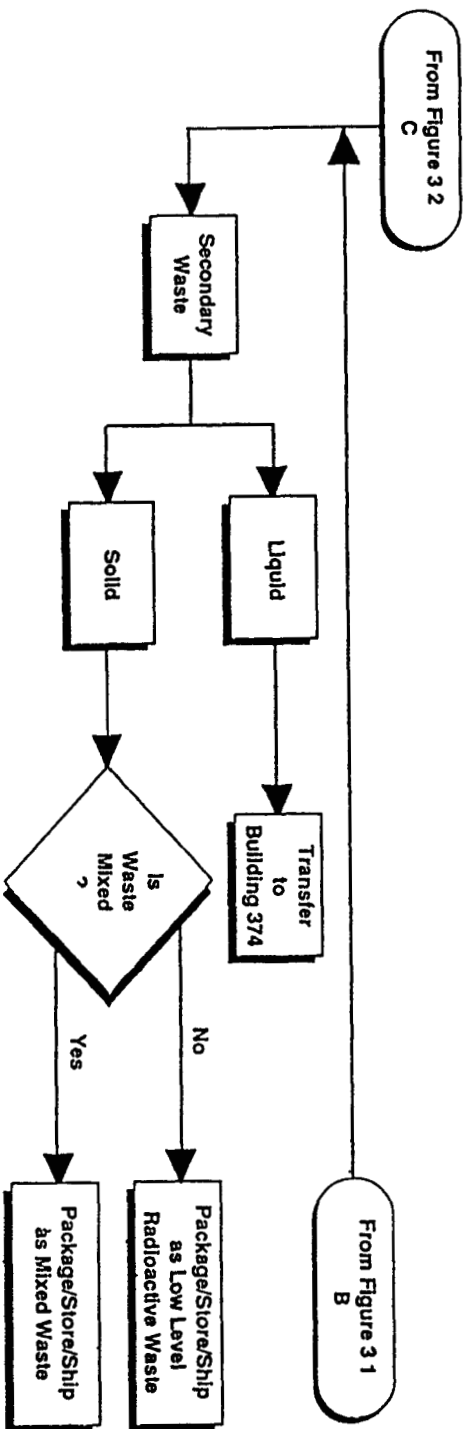
Figure 3 1

Building 788
Dispose as Remediation Waste



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Figure 3.2
Building 788
Dispose as Nonremediation Waste



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Figure 3.3
 Building 768
 Secondary Waste Disposal

- The contaminants within the building are the same as the contaminants within the soils and liners which have been determined to be remediation wastes. The building equipment became contaminated during SEP closure operations (Pondcrete) and by windblown contaminants from the SEPs.

Steve Howard indicated that the waste materials were remediation wastes by definition because the closure of Building 788 was incorporated into the OU4 IM/IRA. Harlen Ainscough and Arturo Duran stated that this was not correct and that the activity was still a RCRA closure.

Arturo Duran specified that the EPA would be interested in primarily ensuring that there would not be a contaminant release during the closure.

Harlen Ainscough specified that the CDH was primarily interested in what would become of RCRA units 21 and 48. The CDH will need to see that the RCRA units were first closed, and then the materials will need to be dispositioned. The closure actions will likely require contaminant characterization. The closure plan will contain a sampling and analysis plan.

2) Waiver for Nitrate and Tritium Contaminated Soil

Harlen Ainscough reported that the CDH would not be able to grant a waiver from addressing soils with nitrate and tritium contamination under the Phase I IM/IRA because a source of contamination should not be left for the final Record of Decision (ROD). The IM/IRA closure needs to be consistent with the final remedy.

3) Applicable Ground Water Standards

This issue will be carried forward until the next team meeting because the CDH expert was on vacation and could not be consulted.

4) Request for Schedule Extension

Harlen Ainscough indicated that CDH would sign the letter for the 43-day IAG schedule extension this week for delivery to DOE by April 8, 1994. The letter will also grant approval for removing the Phase II workplan from the IM/IRA-EA decision document.

The Phase II work plan will be submitted on May 27, 1994 with the IM/IRA-EA decision document, and again on August 6, 1994. It was agreed that the Phase II schedule would not change if the IM/IRA-EA decision document schedule was extended further to account for a substantial design change.

5) CAMU Boundary

Phil Nixon indicated that ES proposed the establishment of the CAMU boundary as the IHSS Boundary so that the SEPs and the CAMU could be certified as closed at the same time. This would not impact the ability to gain approval to commence the post-closure care period. In addition this would minimize the areal extent of the CAMU as requested by the regulations.

It was also discussed that a Temporary Unit would be requested as a contingency plan for waste/equipment storage of Building 788 material prior to consolidation beneath the engineered cover. The plans to store this material within C-Pond, but a contingency plan for a Temporary Unit would be pursued. Harlen Ainscough questioned the regulatory applicability of receiving a Temporary Unit for this material. **ES will investigate the regulatory feasibility of requesting a Temporary Unit for this material.**

Harlen Ainscough specified that it might be better to request a larger CAMU to incorporate additional storage space. Harlen stated that he thought the closure could be certified to commence the post-closure care period prior to total closure of the CAMU (the engineered cover would need to be complete). **It was discussed that any portion of the CAMU that was not beneath the engineered cover would need to be clean closed.** Harlen also indicated that the CAMU may be able to extend into another OU without requiring total remediation of that area in an attempt to close the CAMU. This should be true if

- The area is characterized initially (baseline),
- The area is protected during storage, and
- The area has not been additionally contaminated beyond the original baseline

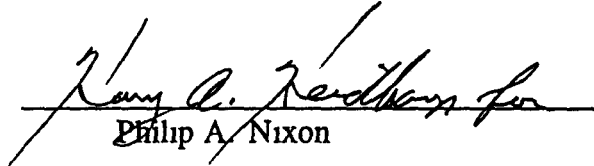
6) Sand Bags

Andy Ledford reported that sand bags had been used to hold the liner down in the SEP 207-B South. These sand bags have solidified during the operational period. The bags will need to remain in place to hold the liner in place after the sludge is removed. Andy proposed that these bags be consolidated beneath the engineered cover. Harlen Ainscough indicated that the sand bags should be characterized because they could have adsorbed contaminants. However, he thought that this material could be dispositioned above the subsurface drainage layer and be protective of human health and the environment.

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7) Comments on the Phase II Workplan

CDH provided final comments on the Phase II workplan EPA also provide final comments on the Phase II workplan


Philip A. Nixon